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March 28, 2013

Ms. Nicole Miller
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00004036

RE: Amended September Monthly Report (8/1/2012-8/31/2012)

Dear Ms. Miller:

This letter is in response to the Commission's request for additional information related to an increase of debts on Line 10 of the Detailed Summary Page and the addition of an independent expenditure on Schedule E of the above referenced report filed by the Service Employees International Union Committee on Political Education (SEIU COPE).

The increase in debts on Line 10 of the Detailed Summary Page occurred when an additional independent expenditure was disclosed on the Amended September Monthly Report. The vendor, The Strategy Group, was not paid by the time September Monthly Report was filed, resulting in a \$13,149.91 addition to the debt owed to this vendor.

The Commission also indicated that an additional independent expenditure was disclosed on Schedule E of the Amended September Monthly Report but not disclosed on a 48-Hour Notice. Upon review of its 2012 independent expenditure activity, the committee determined that while it had previously disclosed the dissemination of the English version of voter canvass literature, the Spanish literature, while containing the same message as the English literature, had inadvertently been omitted from a 48-Hour Notice and the original September Monthly Report. In order to ensure that the public record contained a completely accurate reflection of the committee's independent expenditure activity during the 2012 cycle and to fully comply with the spirit of the law, the committee filed an amendment to disclose the Spanish version of the previously reported independent expenditure. While the committee could have amended the previously filed 48-Hour Notice which disclosed the English version of this literature, the committee felt that treating this expenditure as a separate independent expenditure would reflect the fullest possible disclosure within the spirit of the Commission's rules.

The committee also would like to note that it timely filed over fifty 24 and 48-Hour Notices during the 2012 election cycle to disclose approximately \$13 million in independent expenditures. This one 48-Hour Notice (of a Spanish version of literature that was otherwise timely disclosed) even if it is considered inadvertently omitted represents approximately .1% of the committee's overall independent expenditures over the course of the 2012 cycle.

If you have any further questions regarding this mater, please feel free to contact me at 202-350-6571.

Very truly yours,

Mark Schneider
Counsel for SEIU COPE
cc: Eliseo Medina, Treasurer, SEIU COPE
